

Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

OFFICE: Winnemucca District, Black Rock Field Office

TRACKING NUMBER: DOI-BLM-NV-W030-2013-0009-DNA

CASEFILE/PROJECT NUMBER: N64641

PROPOSED ACTION TITLE/TYPE: Hycroft Mine South Heap Leach Project

LOCATION/LEGAL DESCRIPTION: T.35N. R.29E., Sec. 3,4,5,25,26,33, and 34

APPLICANT (if any): Hycroft Resources & Development (HRDI)

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures. HRDI is requesting reconfiguration of the South Heap Leach Facility (SHLF), an increase to the total number of haul roads, construction of a new truck wash facility, installation of new office facilities, an increase in the cyanide solution pumping rate to the Brimstone Heap Leach pad (BHL), the North Heap Leach pad (NHL), and the South Heap Leach pad (SHL).

B. Land Use Plan (LUP) Conformance

LUP Name*__Sonoma/Gerlach Date Approved__1982__

The proposed action in conformance with the applicable LUP, the Sonoma-Gerlach Management Framework Plan objective M-1 (4130), which states:

Make all public lands and other federally owned minerals available for the exploration and development of mineral and material commodities.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

DOI-BLM-NV-W030-2011-0001-EIS Hycroft Mine Expansion Project; ROD dated 8/14/2012

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource

conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

- a) **Reconfiguration of the South Heap Leach Facility (SHLF):** The proposed action is similar to the South Heap Leach previously analyzed in the Hycroft Mine Expansion EIS. The action is in the same project boundary. The new configuration would result in 747 acres of new disturbance compared to the authorized plan. (See section 2.1.4 of the EIS (DOI-BLM-NV-W030-2011-0001-EIS Hycroft Mine Expansion Project and 24K map).
- b) **Haul roads:** The proposed action is similar to the Hycroft Mine Expansion EIS. The action is in the same project boundary. The new proposal would result in seven acres of new haul roads, in areas of the SHLF that was previously authorized. (see section 1.9.2.6.3 of the EIS (DOI-BLM-NV-W030-2011-0001-EIS Hycroft Mine Expansion Project).
- c) **Truck wash facility:** The proposed action is similar to the Hycroft Mine Expansion EIS. The action is in the same project boundary. It would be constructed on previously disturbed ground. The facility would be of metal construction with a concrete foundation. The facility footprint would be approximately 0.25 acres, near the existing truck wash. (see 24K map).
- d) **New office facilities:** The proposed action is similar to the Hycroft Mine Expansion EIS. The action is in the same project boundary. The new offices would be located near the existing office facilities and would be constructed on existing disturbance. (see 24K map).
- e) **Solution pumping rate increase.** The proposed action is similar to the Hycroft Mine Expansion EIS. The action is in the same project boundary. The proposed action would increase the pumping rate for the BHL from 12,000 gpm to 16,000 gpm, increase the pumping rate for the NHL from 10,000 gpm to 14,000 gpm, and increase the pumping rate for the SHL from 10,000 gpm to 14,000 gpm. The increase in pumping rate would not result in any change in land use. (see section 2.1.4 of EIS (DOI-BLM-NV-W030-2011-0001-EIS Hycroft Mine Expansion Project).

2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

The alternatives analyzed in the EIS and EA's listed in section C are adequate in respect to the proposed action.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new

information and new circumstances would not substantially change the analysis of the new proposed action?

Several archaeological sites included in the Treatment Plan for the Hycroft Expansion Project would be affected more substantially by the change in the design of the South Heap Leach than they were from the original design but they would not be impacted in a substantially different manner. These sites are currently being excavated according to the stipulations in the Treatment Plan for the project. The mitigation currently underway is sufficient to mitigate the effects of the change in the leach pad design, but construction may not begin until the work is completed and that work has been reviewed by BLM and SHPO. In addition, because there is potential for the presence of buried, unidentified significant archaeological sites in the area of the reconfigured South Heap Leach, archaeological monitoring during construction would be required. Therefore there are no circumstances substantially changing the previous analysis (See attached recommended mitigation).

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

The effects would be the same or similar for the actions proposed above, since all of the modifications would be within the existing plan boundary, and are substantially similar in type and impact. The plan amendment proposes 747 acres of new disturbance in the SHLF area. The impacts of the new disturbance are similar to that analyzed in the EIS (DOI-BLM-NV-W030-2011-0001-EIS Hycroft Mine Expansion Project).

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Public outreach was conducted very recently for the 2012 EIS (DOI-BLM-NV-W030-2011-0001-EIS Hycroft Mine Expansion Project). All of the local, state and federal agencies, as well as the public were invited to comment on the EIS. Tribal concerns were focused on the Pulpit Rock area in the northern part of the plan boundary. Consultation for the ground disturbance throughout the plan boundary was done for the EIS. Consultation was deemed not necessary for this minor modification. No additional outreach needs are anticipated for the evaluation of this action. The final NEPA documentation will be made available to the general public on the Winnemucca District webpage.

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E. Persons/Agencies/BLM Staff Consulted

Name /Title	Resource/Agency Represented	Signature/Date	Comments (Attach if more room is needed)
Kathy Ataman	Cultural Resources	\S\ Gerald Dixon for K.A.	See attached comments
Mark Hall - Jim Weiser	Native American Religious Concerns	\S\ Mark Hall	No comments
Kathy Ataman	Paleontological Resources	\S\ K. Ataman 6/12/13	
Joey Carmosino	Recreation	\S\ V.J. Carmosino 6/12/13	
Joey Carmosino	Visual Resource Management	\S\ V.J. Carmosino 6/12/13	
Jim Weiser	Minerals	\S\ Jim Weiser 6/12/2013	
John Callan	Waste, Hazardous or Solid	\S\	
Eric Baxter	Invasive, Non-native species (plants and animals)	\S\ Eric Baxter 6/12/2013	
Rob Burton	Soils	\S\ Rob Burton 6/12/13	
Rob Burton	Wetlands and Riparian	\S\ Rob Burton 6/12/13	
Jean Black	Hydrology	\S\ J. Black 6/12/2013	
Rob Burton	Air Quality	\S\ Rob Burton 6/12/13	In consultation w/ Craig Nichols
Angie Arbonies	Rangeland Management	\S\ Angela Arbonies 6/12/13	
Kathy Cadigan	T&E Species (Plants & Animals)	\S\ K. Cadigan 6/25/13	Comments attached
Kathy Cadigan	Special Status Species (Plants & Animals)	\S\ K. Cadigan 6/25/13	See attached comments
Kathy Cadigan	General Wildlife Habitat	\S\ K. Cadigan 6/25/13	
Melanie Mirati	Wild Horse & Burro	\S\ Melanie Mirati	
Kristine Struck	Wilderness	\S\ Kristine Struck 6/12/13	

Allie Brandt	GIS	\\S\ Allie Brandt 6/12/13	
Kristine Struck	LWC-Lands with Wilderness Characteristics	\\S\ Kristine Struck 6/12/13	
Lynn Ricci	NEPA Coordinator	\\S\ L.B. Ricci 7/11/13	

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Note: Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

☒ **Conclusion** *(If you found that one or more of these criteria is not met, you will not be able to check this box.)*

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM' compliance with the requirements of the NEPA (See attached recommended cultural and wildlife resources mitigation).

____\\S\ J. R. Weiser_____
Signature of Project Lead

____\\S\ Lynn B. Ricci_____
Signature of NEPA Coordinator

____\\S\ Gerald Dixon_____
Signature of the Responsible Official

Date 7/15/13

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.